

**Company Name** Sysco  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 9.6 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
4.1	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
0.2	25	D. Performance: Company Human Rights Practices
1.9	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company indicates that 'The respect and protection of fundamental human rights is critically important to us. We operate globally in a manner that supports the basic human rights'. [Global Code of Conduct, 12/06/2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: The supplier code states that additionally to the commitments they must make, other resources to follow are the OECD Guidelines for Multinational Enterprises, the UN Universal Declaration of Human Rights, the International Labour Organization Conventions and Recommendations and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. However no evidence has been found that Sysco commits to these initiatives. [Sysco corporation supplier code of conduct, N/A: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core [Global Code of Conduct, 12/06/2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>Not Met: Company has an explicit commitment to All four ILO Core: The company indicates that 'We operate globally in a manner that supports the basic human rights, including the rights of associates to have fair wages and benefits in accordance with local laws, a safe and healthy working environment, a right to freedom of association, a workplace free of harassment and discrimination and one that prohibits child labor, forced labor and human trafficking'. However, no</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>evidence has been found of a commitment to respect the right to collective bargaining. [Global Code of Conduct, 12/06/2017: <a href="http://sysco.com">sysco.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: The Supplier Code covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Met: Company explicitly list All four ILO for suppliers: The Supplier code explicitly covers child labour, forced labour, discrimination. Regarding freedom of association and collective bargaining, it states 'you will give your employees the right to freely associate and organize and to legally bargain collectively'. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The company indicates that 'It is extremely important to us to safeguard the health and safety of our work environment and the communities in which we operate. Each of us is responsible for acting in a way that protects ourselves and others'. [Global Code of Conduct, 12/06/2017: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The company indicates that 'Sysco requires that all facilities that are used to produce goods for Sysco have a safe and healthy work environment for all the employees. When housing is provided, it should also be clean and safe'. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The supplier code states that 'you will comply with all legal employment and labor requirements, including those relating to minimum wage and overtime. In countries that set a maximum work week, you will comply with those requirements'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week, and consensual overtime paid at a premium rate</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Met: Expects suppliers to respect at least one of these rights: The company indicates in the supplier code of conduct that 'If foreign or migrant workers are working for you, you must follow the labor and immigration laws of the host country. Before hiring, the basic terms of the employment must be provided to the workers in a language they understand. Workers will be able to keep their own passports and other forms of personal identification, which are never to be withheld by you or any third party'. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment: In its Supplier Code of Conduct, there is a provision which states: 'If you violate this Code, Sysco may either terminate its business relationship with you, or may require the affected facility to implement a corrective action plan. Sysco will continue to develop its monitoring systems to assess and ensure compliance with this Code'. However, although the Company indicates that suppliers may have to implement a corrective action plan, it is not clear the Company expects supplier to commit to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Sysco corporation supplier code of conduct, N/A: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Global Supplier Code of Conduct states 'We strive to create an environment where associates feel comfortable to raise concerns and are confident that those concerns will be addressed. Sysco prohibits retaliation against anyone who reports a concern in good faith or who participates in an internal or external investigation. This means that an associate who has raised a concern that is honest, sincere and complete to the best of their knowledge, cannot and must not be the target for any type of retaliation. Retaliation could include, but is not limited to, termination, job demotion, intimidation, humiliation, exclusion and threats. Retaliation will not be tolerated'. However, this does not cover human rights defenders more broadly, or extend beyond complainants. [Global Code of Conduct, 12/06/2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment</li> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The company indicates that 'The Committee shall consist of at least three members of the Board. The Committee shall review, evaluate, and provide input on Sysco's Corporate Social Responsibility Strategy (the "CSR Strategy"), which focuses on People, Products and Planet, and on implementation of the CSR Strategy. The Committee shall assess the impact of Sysco's policies and practices on associates, customers, shareholders, and the communities where Sysco operates, including, but not limited to, the impact of such policies and practices on environmental, sustainability, health and well-being, and human rights. [Corporate Social Responsibility Committee Charter, 05/2019: <a href="https://investors.sysco.com">investors.sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe HR expertise of Board member</li> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member: The Company indicates that 'The Compensation and Leadership Development Committee of the Board of Directors is responsible for Sysco's executive compensation policies. [This Committee] establish compensation policies that effectively attract, retain, and incentivize executive officers. The Committee's responsibilities are as follows: Establishes executive compensation philosophies, policies, plans, and programs to ensure that compensation actions link pay for performance, provide competitive pay opportunity to attract and retain key executive talent, provide accountability for short- and long-term performance and align the interests of the "senior officers" (i.e., the CEO and those reporting to the CEO) with those of stockholders. [...]' However no evidence has been found of incentives or performance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			management schemes linked to and aspect of the company HR policies. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HR implementation and decision making: The Company reports in its CSR 2019 that its 'Corporate Social Responsibility Committee consists of at least three Board members and reviews, evaluates, and assesses Sysco's Corporate Social Responsibility (CSR) Strategy implementation.' However, this is a board level committee. In addition, there are some references about a CSR team. However, no further information found about this team or another with senior level with human rights responsibilities within the Company. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights: The Company indicates that 'The Compensation and Leadership Development Committee of the Board of Directors is responsible for Sysco's executive compensation policies. [This Committee] establish compensation policies that effectively attract, retain, and incentivize executive officers. The Committee's responsibilities are as follows: Establishes executive compensation philosophies, policies, plans, and programs to ensure that compensation actions link pay for performance, provide competitive pay opportunity to attract and retain key executive talent, provide accountability for short- and long-term performance and align the interests of the "senior officers" (i.e., the CEO and those reporting to the CEO) with those of stockholders. [...]' However no evidence has been found of incentives or performance management schemes linked to and aspect of the company HR policies for senior managers. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Communicates its policy to all workers in own operations: The Company states in its CSR 2019 that: 'All employees are trained on human rights as part of our annual global Code of Conduct training'. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>] &amp; [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain: The Company indicates that it 'has established a Global Supplier Code of Conduct (Supplier COC), which describes the legal, moral, and ethical standards we expect from suppliers, including the protection of human rights. The Supplier COC applies to all suppliers throughout our global operations [...]. It also expands Sysco's monitoring rights with third parties beyond Sysco Brand products and provides clear reporting requirements for any violation or potential violations. [...] We expect each supplier to operate in full compliance with the Supplier COC and with all applicable national, state, provincial, regional, local, and other laws and regulations. The Supplier COC also applies to affiliates and subcontractors of suppliers, and to their respective facilities to the extent those facilities supply goods for ultimate sale to Sysco.' However, it is not clear the steps it takes to communicate its human rights policy commitment(s) to direct suppliers and down the supply chain (or requires its suppliers to do so). [Sysco corporation supplier code of conduct, N/A: <a href="https://www.sysco.com">sysco.com</a>] &amp; [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not Met: Requires suppliers to communicate policy requirements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company states in its CSR 2019 that: 'All employees are trained on human rights as part of our annual global Code of Conduct training.' [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>] &amp; [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a.</li> <li>• Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The company indicates that 'all Sysco Brand approved suppliers in high-risk Latin American and Asian countries must undergo third-party assessments to identify potential risks relating to wages, working hours, discrimination, worker safety, living conditions, and child and forced labor. UL's Responsible Sourcing group, a global independent social compliance assessment provider and key Sysco partner, has conducted assessments on Sysco's behalf since 2008. (...) In Fiscal Year 2018, there were 160 assessments conducted in 17 countries. This total included 26 initial audits and 134 assessments of facilities that had been assessed in the preceding year. Of the suppliers that have participated in the program for multiple years, 20 percent demonstrated improvement when compared to the previous audit. Additionally, nine facilities achieved a perfect score. We will continue to work with our suppliers to identify and minimize human rights risks in their operations' [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored: Regarding its audits, the Company indicates: 'In FY2021, 165 assessments were conducted in 19 countries'. However, it is not clear the proportion of its supply chain that is monitored. [2021 CSR Report, 2021: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process: It also reports: 'Based on assessment findings, we work with Sysco Brand suppliers and processors that do not achieve perfect scores to develop and implement improvement plans. Sysco takes immediate action, including termination of business relationships, with any suppliers that fail to comply and meet our social compliance assessment program. In Fiscal Year 2019, 178 assessments were conducted in 19 countries. This total included 42 initial audits and 136 assessments of facilities that had been audited in Fiscal Year 2018. Among suppliers that have participated in the program for</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>multiple years, 30 percent demonstrated improvement when compared to their previous audit a positive trend. We were also pleased to note that 14 facilities achieved a perfect score in Fiscal Year 2019, and the percentage of facilities scoring in the top two categories grew as well. Some 16 percent received a lower rating than the previous year, and one supplier was terminated for not meeting expectations.' However, no evidence found in relation to number of incidences found. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Disclose findings and number of corrective action: As indicated above, the Company reports that 'one supplier was terminated for not meeting expectations'. However, no particular details found about examples of corrective actions carried out. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: The supplier Code of Conduct indicates that 'To meet this standard, Sysco requires each of its suppliers, and each of their subcontractors and supply chain providers that ultimately supply goods and services to Sysco to comply with this Supplier Code of Conduct. In addition the company indicates that 'Sysco will only initiate and renew contractual relationships with suppliers that do not violate basic human rights'. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The supplier Code of Conduct indicates that 'If you violate this Code, Sysco may either terminate its business relationship with you, or may require the affected facility to implement a corrective action plan. Sysco will continue to develop its monitoring systems to assess and ensure compliance with this Code'. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights: No evidence found in relation to positive incentives via purchasing practices to encourage respect for human rights in the supply chain. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: Working with suppliers to meet HR requirements: The Company indicates that 'Based on assessment findings, we work with Sysco Brand suppliers and processors that do not achieve perfect scores to develop and implement improvement plans'. Also, 'Sysco is a member of the Seafood Task Force, an organization that includes retail, foodservice, and NGO representation. The task force's mission is to strengthen worker well-being and compliance with laws governing the seafood supply chain by implementing a track and trace international verification system from vessel to feed mill; developing a standard code of conduct model for ports, brokers, and vessels; and supporting efforts to mitigate the effects of overfishing, which can contribute to human rights abuses in the shrimp supply chain. However, no evidence found of specific work carried out by the Company with business relationships to improve human rights performance. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>] &amp; [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>]</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates that 'All Sysco Brand approved suppliers in high-risk Latin American and Asian countries must undergo third party assessments to identify potential risks relating to wages, working hours, discrimination, worker safety, living conditions, and child and forced labor'. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>Not Met: How process applies to supply chain</li> <li>Not Met: Public disclosure of the results of HR assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Action Plans to mitigate risks</li> <li>Not Met: Description of how global system applies to supply chain</li> <li>Met: Example of actions decided on at least 1 salient HR issues: The Company indicates: 'Sysco is a member of the Seafood Task Force, an organization that includes retail, foodservice, and NGO representation. [...] We reinforced our commitment to enhancing the sustainability of seafood procurement practices and standards by extending our longstanding alliance with the World Wildlife Fund (WWF) through 2020. Sysco's WWF partnership was created with the goal of advancing the health of fisheries and fishing communities around the world. Sysco has remained vigilant in monitoring the performance of suppliers and processors in Southeast Asia[...]. Sweden's Menigo Foodservice has collaborated with the sustainability firm QuizzRR and the Axfoundation, an NGO, on an initiative to improve conditions for food workers in Thailand. The aim of the pilot project was to develop training for industry workers and managers to educate them on their responsibilities and rights. The project's second phase, which launched in Fall 2018, is designed to tailor the training to Thai conditions and is being translated into the most commonly spoken dialects in the country. Menigo has encouraged its own suppliers in Thailand to take part in the training'. Menigo Foodservice is one of the Company's international operations. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: System for tracking or monitor if actions taken are effective</li> <li>Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Channel accessible to all workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Channel is available in all appropriate languages and workers aware</li> <li>Not Met: Describe how workers in the supply chain have access to grievance mechanism</li> <li>Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The Company indicates that 'The Ethics Line, Sysco's global, multi-lingual hotline that you can contact via phone or web. It is available to all – associates, vendors, consultants, temporary associates, contractors, subcontractors or suppliers – to voice concerns'. The Company has</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external individuals and communities		clarified to the CHRB that the Ethics Line is available to anyone to report a concern at <a href="https://ethicsline.sysco.com">ethicsline.sysco.com</a> . [Global Code of Conduct, 12/06/2017: <a href="https://sysco.com">sysco.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages and stakeholder awareness: The Company indicates that 'The Ethics Line, is available 24 hours a day, seven days a week, 365 days a year, worldwide, with country-based toll free numbers and interpreters when needed'. In addition to there is an online tool available in more than 40 languages. The Company has also clarified that it is a 'multi-lingual hotline'. [Global Code of Conduct, 12/06/2017: <a href="https://sysco.com">sysco.com</a>] &amp; [Ethics line website, N/A: <a href="https://ethicsline.sysco.com">ethicsline.sysco.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed</li> <li>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation</li> <li>• Not Met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates that 'You will have a no retaliation policy that allows your employees to speak with any Sysco employee without fear of retaliation by your management'. [Sysco corporation supplier code of conduct, N/A: <a href="https://sysco.com">sysco.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes how remedy has been provided: The Company indicates that it is 'committed to playing a meaningful role in addressing this serious issue and will engage with interested stakeholders to develop and implement actionable, practical, and effective solutions.' However no description has been found of the approach taken to provide remedy for victims. [CSR 2019, 11/2019: <a href="https://sysco.com">sysco.com</a>]</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company has provided feedback to CHRB regarding this indicator. However, no material evidence was found.</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	and incorporating lessons learned		Score 2 <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: The Supplier code of conduct indicates that 'All of your employees will be of legal age established by local law. If the local law does not set a minimum age, your employees must be at least fourteen (14) years old. You must maintain official and verifiable documentation of each of your employee's date of birth, or if documentation is not available, have a legally recognizable means of confirming your employees' age. An exception to this is legitimate workplace apprenticeship programs, which comply with all laws and regulations. Except where local law allows, workers under the age of eighteen (18) should not perform hazardous work and may be restricted from night work with consideration given to educational requirements. More details can be found in ILO Convention No. 138'. However, no evidence found in relation to remediation programmes. [Sysco corporation supplier code of conduct, N/A: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on child labour</li> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Debt and fees rules in codes or contracts: The Supplier code of conduct indicates that 'You shall not require workers to pay recruitment and/or hiring-related fees to employers, agents or labor broker outside legally allowed fees. All fees charged to workers must be disclosed in advance and documented in a language that the workers understand'. However no evidence has been found of guidelines that include refraining from imposing any financial burden. [Sysco corporation supplier code of conduct, N/A: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on debt &amp; fees</li> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Global Supplier Code of Conduct states "Foreign or Migrant Workers – If foreign or migrant workers are working for you, you must follow the labor and immigration laws of the host country. Before hiring, the basic terms of the employment must be provided to the workers in a language they understand. Workers will be able to keep their own passports and other forms of personal identification, which are never to be withheld by you or any third party." [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: The Supplier code of conduct indicates that 'You will give your employees the right to freely associate and organize and to legally bargain collectively. More information can be found in ILO Conventions Nos. 87 and 98'. However, no explicit guidelines found against intimidation or harassment against union members or representatives. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Sets out clear Health and Safety requirements: The Supplier code of conduct indicates that 'Sysco requires that all facilities that are used to produce goods for Sysco have a safe and healthy work environment for all the employees'. However no evidence has been found of specific clear health and safety requirements. [Sysco corporation supplier code of conduct, N/A: <a href="http://sysco.com">sysco.com</a>]</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period</li> <li>• Not Met: Fatalities rate for lasting reporting period</li> <li>• Not Met: Occupation disease rate for last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Rules on land &amp; owners in codes or contracts</li> <li>• Not Met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>• Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Rules on water stewardship in codes or contracts: The Company indicates that 'Although we are not a significant water user, we do use water for refrigeration systems, washing vehicles and landscaping. We have identified water-saving opportunities including recycling water from vehicle washing stations and refrigeration units and using rainwater for landscaping at our offices'. However no evidence has been found of water rights guidelines in the contractual arrangements. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 7.71 out of 80 points scored in themes A-D has been applied to produce a score of 1.93 out of 20 points for theme E.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote

continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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